

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

KATELYNN A. MOBLEY and  
JOHN P. MOBLEY,

Plaintiffs,

v.

EDWARD SLOAN AND ASSOCIATES,  
INC.,

Defendant.

3:19-cv-00986-N

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT**

**To the Clerk of the U.S. District Court for the Northern District of Texas**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiffs KATELYNN A. MOBLEY and JOHN P. MOBLEY, requests that the Clerk of this Honorable Court enter the default of Defendant EDWARD SLOAN AND ASSOCIATES, INC., for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the affidavit of Nathan C. Volheim, Esq. attached hereto.

Dated: May 21, 2019

Respectfully submitted,

s/ Nathan C. Volheim

Nathan C. Volheim, Esq. #6302103

*Counsel for Plaintiff*

Sulaiman Law Group, Ltd.

2500 South Highland Avenue, Suite 200

Lombard, Illinois 60148

(630) 568-3056 (phone)

(630) 575-8188 (fax)

nvolheim@sulaimanlaw.com

**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, certifies that on May 21, 2019, he caused a copy of the foregoing PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT, to be served by U.S. Certified mail, postage prepaid and email to:

Edward Sloan and Associates, Inc.  
368 Private Road 8565  
Winnsboro, TX 75494  
Email: esa@esarecovery.com

Edward Sloan and Associates, Inc.  
RT. 2, Box 21135  
Winnsboro, TX 75494

Edward Sloan and Associates, Inc.  
PO Box 788  
Winnsboro, TX 75494

Respectfully submitted,

s/ Nathan C. Volheim  
Nathan C. Volheim, Esq. #6302103